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Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

**SAMUEL HASSAN KUYATEH (001),**

Defendant.

Case No: CR2017-134120-001 DT

**81 SGJ 122**

**INDICTMENT**

**CHARGING VIOLATIONS OF:**

**COUNT 1: COMPUTER TAMPERING,**  
a Class 5 Felony, in violation of A.R.S. § 13-2316 (A)(5)

**COUNTS 2 – 3: UNLAWFUL  
DISCLOSURE OF IMAGE DEPICTING  
NUDITY OR SPECIFIC SEXUAL  
ACTIVITIES,** Class 4 Felonies, in violation  
of A.R.S. §§ 13-1425, 13-3601, and 13-3601.02

The State Grand Jury for the State of Arizona accuses charging on this **SAMUEL HASSAN KUYATEH** this 31<sup>st</sup> day of July 2017, that in or from Maricopa County, Arizona:

**COUNT 1**

**COMPUTER TAMPERING**

On or between January 1, 2015 and March 30, 2015, **SAMUEL HASSAN KUYATEH (001)**, without authority or exceeding authorization of use, recklessly used a computer, computer system, or network to engage in a scheme or course of conduct that was directed at another person and that seriously alarmed, tormented, threatened, or terrorized the other person, TO WIT: Millicent Hanciles, that would cause a reasonable person to suffer substantial emotional distress and served no legitimate purpose, in violation of A.R.S. §§ 13-2316, 13-701, 13-702 and 13-801.

**COUNT 2**

**UNLAWFUL DISCLOSURE OF IMAGE DEPICTING**

**STATES OF NUDITY OR SPECIFIC SEXUAL ACTIVITIES**

On or about July 9, 2017, **SAMUEL HASSAN KUYATEH (001)**, intentionally disclosed an image of another person, TO WIT: Millicent Hanciles, the mother of his child, who was identifiable from the image itself or from information displayed in connection with the image, while in a state of nudity or engaged in a specific sexual activity, with the intent to harm, harass, intimidate, threaten, or coerce Millicent Hanciles, and when Millicent Hanciles had a reasonable expectation of privacy, in violation of A.R.S. §§ 13-1425, 13-3601, 13-3601.02, 13-701, 13-702 and 13-801.

**COUNT 3**

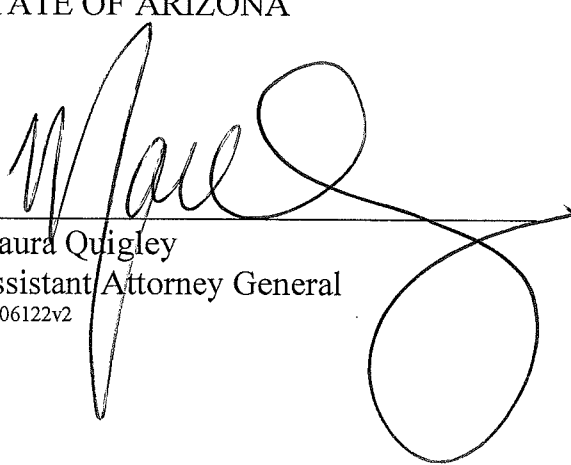
**UNLAWFUL DISCLOSURE OF IMAGE DEPICTING**  
**STATES OF NUDITY OR SPECIFIC SEXUAL ACTIVITIES**

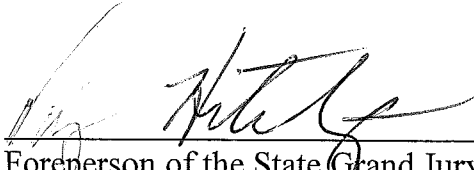
On or about July 9, 2017, **SAMUEL HASSAN KUYATEH (001)**, intentionally disclosed an image of another person, TO WIT: Millicent Hanciles, the mother of his child, who was identifiable from the image itself or from information displayed in connection with the image, while in a state of nudity or engaged in a specific sexual activity, with the intent to harm, harass, intimidate, threaten, or coerce Millicent Hanciles, and when Millicent Hanciles had a reasonable expectation of privacy, in violation of A.R.S. §§ 13-1425, 13-3601, 13-3601.02, 13-701, 13-702 and 13-801.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

A TRUE BILL  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
Maura Quigley  
Assistant Attorney General  
#6106122v2

Dated: 7/31/17  
  
Foreperson of the State Grand Jury